

REMARKS

This is intended as a full and complete response to the Office Action dated December 8, 2006, having a shortened statutory period for response set to expire on March 8, 2007. Please reconsider the claims pending in the application for reasons discussed below.

Claims 1-3, 5-21, 26-41, 43, 44, 46, 48-55, 82-86, 90-101, 104, 105, 107-109, and 111-114, remain pending in the application after entry of this response. Claims 8, 11, 16, 19, 27, 33, 35, 36, 39, 40, 42, 46, 49, 82, and 92-94, stand withdrawn by the Examiner. Claims 4, 102, 106, and 110 have been cancelled by the Applicants. New claims 112-114 have been added. Claims 1-7, 9, 10, 12-15, 17, 18, 20, 21, 26, 28-32, 34, 37, 38, 41, 43, 44, 50-55, 82-86, and 90-111, are rejected by the Examiner. Claims 9 and 37 are objected to. Reconsideration of the rejected claims is requested for reasons presented below.

Claim Objections

Claims 9 and 37 are objected to because of the following informalities: depend on withdrawn claims. Appropriate correction is required. Claims 9 and 37 have been amended to overcome this objection. Claims 9 and 37 have been amended to overcome this rejection. Removal of the objection is therefore requested.

Claim Rejections Under 35 U.S.C. § 112

Claims 3, 5, 29-32, 95, 99, 103, 107, and 111 are rejected under 35 U.S.C. § 112, second paragraph, as being indefinite for failing to particularly point out and distinctly claim the subject matter which applicant regards as the invention. Claims 2, 4, 29-32, 95, 99, 103, 107, and 111 have been amended to overcome this rejection. Removal of the rejection is therefore requested.

Claim Rejections Under 35 U.S.C. § 102

Clams 1-7, 9, 10, 12-15, 17, 18, 20, 21, 26, 28-32, 34, 38, 41, 43, 44, 48, 50-55, 83-86, 90, 91, and 95-111 are rejected under 35 U.S.C. § 102(b) as being anticipated by *Zheng, et al. (US 6,571,870 B2)*. The Examiner states "*Zheng et al.* discloses. . . an expansion device (16A & 16B). .."

The *Zheng, et al.* reference discloses a method and apparatus to vibrate a downhole component. The *Zheng* reference does not disclose an expansion device or expanding a tubing. The vibration devices 16, of the *Zheng* reference, are provided to reduce the "overall friction force between the string and the wellbore. . . , enabling the tubing string to be run deeper into the wellbore." (Col. 4, ln. 21-24). There is no mention of tubing expansion in *Zheng*. Therefore, the *Zheng* reference does not teach, show, or suggest expanding the tubing as recited in Clams 1-7, 9, 10, 12-15, 17, 18, 20, 21, 26, 28-32, 34, 38, 41, 43, 44, 48, 50-55, 83-86, 90, 91, and 95-111. Therefore, Applicants believe that Clams 1-7, 9, 10, 12-15, 17, 18, 20, 21, 26, 28-32, 34, 38, 41, 43, 44, 48, 50-55, 83-86, 90, 91, and 95-111 are in condition for allowance.

New Claims

New claims 112-114 have been added. No new matter has been added. Claims 112-114 depend from claims 1, 83, and 85, respectively. As stated above Applicants believe that claims 1, 83, and 85 are in condition for allowance and thus, claims 112-114 are also in condition for allowance.

Conclusion

The references cited by the Examiner, do not teach, show, or suggest the invention as claimed. Having addressed all issues set out in the office action, Applicants respectfully submits that the claims are in condition for allowance and respectfully request that the claims be allowed.

Respectfully submitted,

A handwritten signature in dark ink, appearing to read "Jason C. Huang", is written over a horizontal line.

Jason C. Huang
Registration No. 46,222
PATTERSON & SHERIDAN, L.L.P.
3040 Post Oak Blvd. Suite 1500
Houston, TX 77056
Telephone: (713) 623-4844
Facsimile: (713) 623-4846
Attorney for Applicant(s)